

Newcomb, Chris

From: Spigel, Robin
Sent: Friday, April 9, 2021 12:50 PM
To: Azman, Darren
Cc: Gibbs, Charles; Yang, Darren; Adams, Blaine; Rubenstein, Jonathan; Lawrence, John; Kazlow, Jordan
Subject: RE: Griddy - 2004 Request for Production

While we intend to object to certain of the Committee's Rule 2004 requests, in order for us to start getting you information as quickly as possible we would like to begin a rolling production of documents the Debtor will agree to produce before our objections are due or made. We are working to start production as soon as today. Please confirm that any production of documents the Debtor makes before making formal objections will be subject to the forthcoming objections, that the Committee will not argue that such production waives or limits any timely objection the Debtor subsequently makes, and that the Committee understands that in making such production the Debtor reserves all rights.

Also, our email re confidentiality until we get a formal agreement in place says that everything we provide is Highly Confidential. However, for clarity, we will mark docs we'll be producing as Confidential or Highly Confidential - AEO, as applicable – as opposed to assuming for the moment that they're all Highly Confidential.

Thanks.
Robin

Robin Spigel

Partner

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BAKER BOTTS 

From: Azman, Darren <Dazman@mwe.com>
Sent: Thursday, April 8, 2021 12:24 AM

To: Spigel, Robin <robin.spigel@bakerbotts.com>

Cc: Newcomb, Chris <chris.newcomb@bakerbotts.com>; Gibbs, Charles <Crgibbs@mwe.com>; Yang, Darren <Ddyang@mwe.com>; Adams, Blaine <Badams@mwe.com>

Subject: Griddy - 2004 Request for Production

[EXTERNAL EMAIL]

Robin,

As discussed, attached is our request for production. Please confirm as soon as possible by reply email that the Debtor and the Non-Debtor Affiliates (as defined in the attached) agree to produce the requested documents. If the Non-Debtor Affiliates are represented by separate counsel, please send us their contact information.

Please note that this is the Committee's initial set of production requests, which we are sending to you now in the interest of time. The Committee reserves the right to serve further document requests in the future.

Thanks,
Darren

DARREN AZMAN
Partner

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